

# EXHIBIT 2



Kat McKay <kat@pabilaw.org>

RE: [REDACTED] Resolution Meeting for [REDACTED]

Kat McKay <kat@pabilaw.org>

Thu, Jul 25, 2024 at 9:51 AM

To: BJohnson@mail.nysed.gov, CZwierko@mail.nysed.gov

Cc: "justina.rivera@comptroller.nyc.gov" <justina.rivera@comptroller.nyc.gov>, "chamamg@comptroller.nyc.gov" <chamamg@comptroller.nyc.gov>, Peter Albert <peter@pabilaw.org>, Kelly Agnello <KAgnello@schools.nyc.gov>, "patrick@pabilaw.com" <patrick@pabilaw.com>, Mariama Sandi <MSandi@schools.nyc.gov>, "hearings@pabilaw.org" <hearings@pabilaw.org>, Daniel Costigan <DCostigan@schools.nyc.gov>, "mdambro@comptroller.nyc.gov" <mdambro@comptroller.nyc.gov>, "knagors@comptroller.nyc.gov" <knagors@comptroller.nyc.gov>, "dagami@comptroller.nyc.gov" <dagami@comptroller.nyc.gov>, "sfelici@comptroller.nyc.gov" <sfelici@comptroller.nyc.gov>, "kwall@comptroller.nyc.gov" <kwall@comptroller.nyc.gov>, "jrivera@comptroller.nyc.gov" <jrivera@comptroller.nyc.gov>, "ljacobs@comptroller.nyc.gov" <ljacobs@comptroller.nyc.gov>, ashames@schools.nyc.gov, BAugustin@mail.nysed.gov, MBromberg@mail.nysed.gov, sbolling@mail.nysed.gov, amchugh@mail.nysed.gov

Dear Ms. Johnson, Ms. Zwierko, and other members of NYSED Special Education Quality Assurance Team,

As you can see below, the New York City Department of Education is doing exactly what NYSED previously challenged East Ramapo School District for in the U.S. District Court for the Southern District of New York, *E. Ramapo Cent. Sch. Dist. v. DeLorenzo*, 13-cv-1613(CS) -- they are engaging in "patterns and practices ... inconsistent with both federal and New York State law and regulation governing the education of students," by allowing one District representative the decision-making authority to conduct Resolution Meetings for students with disabilities, which NYSED has already found to be inconsistent with federal and state law.

We are respectfully requesting NYSED to open an investigation into this illegal practice by NYC DOE. We currently have several federal matters in the Southern District of New York concerning our Clients, but this appears to be a systemic practice which requires NYSED oversight to protect the 200,000+ special education students in the NYC DOE system. Here are the current cases for your review:

*Moonsammy et al. v. Banks et al.*, 1:24-cv-05151-PAE

*Thomas et al. v. Banks et al.*, 1:24-cv-05138-JLR

*Chaperon et al. v. Banks et al.*, 1:24-cv-05135-JHR

*Bruckauf et al. v. Banks et al.*, 1:24-cv-05136-LGS

*Ramos et al. v. Banks et al.*, 1:24-cv-05109-LGS

We thank you in advance for your intervention and we welcome your support.

Regards,

Kat

**Kat McKay J.D., Ph.D.**

**The Liberty & Freedom Legal Group**

300 East 95th Street, Suite #130

*New York, New York 10128*

*Tel. (484) 340-7703*

[Quoted text hidden]